1 SUZANNE A. LUBAN Attorney At Law State Bar No. 120629 3758 Grand Ave. #4 Oakland, California 94610 3 Telephone 510/832-3555 4 Attorney for Defendant 5 JOSE FRANCISCO LEYVA 6 7 UNITED STATES DISTRICT COURT 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA 9 10 UNITED STATES OF AMERICA, D.C. No. CR 05-671-WHA (San Francisco) 11 Plaintiff, REQUEST TO ALLOW 12 OUT OF STATE TRAVEL VS. FOR EMPLOYMENT TRAINING JOSE FRANCISCO LEYVA, 13 AND [PROPOSED] ORDER 14 Defendant. Judge: Hon. Nandor J. Vadas 15 This Court released defendant Jose Leyva on an unsecured \$15,000 personal 16 surety bond. Among the pretrial release conditions imposed was the geographical 17 limitation to the Northern District of California. Mr. Leyva has been supervised by 18 Pretrial Services, and is presently under the supervision of Pretrial Officer Michelle 19 Nero. Mr. Leyva is employed as an independent contractor installing after market 20 21 electronics such as video, navigation systems, and sat tracking devices. 22 In order to obtain further training and familiarity with new products supplied by one of his primary vendors, Sony, Mr. Leyva wishes to attend a business seminar 23 24 in South Beach, Florida presented by Sony. The seminar, called the "Destination" 25 Playstation," is an invitation-only seminar geared to train and educate sellers and installers on Sony's new product lines. Mr. Leyva seeks permission to attend five days – March 1 26 27

1

28

1	through 5, 2006 – (including travel) of this seven-day event. This seminar will be
2	instrumental in training Mr. Leyva for continued employment in his field.
3	The pretrial services officer, Michelle Nero, has advised defense counsel that she
4	has not objection to modifying the terms of the release order to permit Mr. Leyva to travel
5	to Florida and attended this Sony training seminar, provided he advises Pretrial of the
6	details of his itinerary in advance. The prosecutor, Robert Rees, has informed the
7	undersigned that he does not take a position on this request.
8	
9	DATED: February 21, 2006/S/ Suzanne A. Luban
10	SUZANNE A. LUBAN, Counsel for Defendant Leyva
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22 23	
23	
25	
25 26	
27	
28	2
20	2

Case 3:05-cr-00671-WHA Document 37 Filed 03/01/06 Page 2 of 3

1	
2	
3	
4	
5	UNITED STATES DISTRICT COURT
6	FOR THE NORTHERN DISTRICT OF CALIFORNIA
7 8 9	UNITED STATES OF AMERICA,) D.C. No. CR 05-671-WHA) (San Francisco))
10	vs.) [PROPOSED] ORDER
11	JOSE FRANCISCO LEYVA,)
12	Defendant.) Judge: Hon. Nandor J. Vadas
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	For Good Cause Shown and for the reasons stated herein: 1. The conditions of pretrial release for Jose Leyva shall be modified to allow Mr. Leyva travel to Florida to attend a Sony training seminar from March 1 through 5, 2006, provided he advises Pretrial of the details of his itinerary in advance. IT IS SO ORDERED. DATED: 3/1/06 HON. NANDOR J. VADAS United States District Judge
28	

Case 3:05-cr-00671-WHA Document 37 Filed 03/01/06 Page 3 of 3